

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,  
Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth and HTA.

ORDER GRANTING FOUR HUNDRED EIGHTIETH OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO  
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO SATISFIED CLAIMS

Upon the *Four Hundred Eightieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to Satisfied Claims* [ECF No. 21432] (the “Four Hundred Eightieth Omnibus Objection”),<sup>2</sup> filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the Puerto Rico Highways and Transportation Authority (“HTA”, and together with the Commonwealth, the “Debtors”), dated July 1, 2022, for entry of an order disallowing in their entirety certain claims filed against the Debtors,

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Eightieth Omnibus Objection.

as more fully set forth in the Four Hundred Eightieth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Eightieth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Eightieth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Eightieth Omnibus Objection (collectively, the “Satisfied Claims”) have been satisfied; and the Court having determined that the relief sought in the Four Hundred Eightieth Omnibus Objection is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Eightieth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Eightieth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Satisfied Claims are disallowed in their entirety; and it is further

ORDERED that Kroll, is authorized and directed to designate the Satisfied Claims as expunged on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21432 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Eightieth Omnibus Objection**

## Four Hundred Eightieth Omnibus Objection

## Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	CONSOLIDATED WASTE SERVICES PO BOX 1322 GURABO, PR 00778	05/22/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	25660	\$14,728.00
Reason: Invoices totaling \$14,728.00 were paid via checks 00123111, 00124158, and 00253862 on 05/31/2017, 06/05/2017, and 10/01/2019.						
2	DAT@ACCESS HÉCTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	10766	\$148,233.00
Reason: Invoices totaling \$148,233.00 were paid via check 00004957 on 06/01/2018 and via EFT 00000056 on 02/04/2021.						
3	DAT@ACCESS COMMUNICATIONS INC. HECTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/04/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9459	\$12,013.00
Reason: Invoice totaling \$12,013.00 was paid via check 046392.						
4	DAT@ACCESS COMMUNICATIONS, INC HECTOR FIGUEROA-VINCENTY, ESQ. 310 CALLE SAN FRANCISCO SUITE 32 SAN JUAN, PR 00901	05/04/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	9476	\$26,500.00
Reason: Invoices totaling \$26,500 were paid via EFTs 289802 and 00083802 on 05/11/2018 and 06/13/2018.						

## Four Hundred Eightieth Omnibus Objection

## Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
5	FINCA LA MATILDE, INC. EILEEN M. COFFEY 9166 CALLE MARINA PONCE, PR 00717	05/07/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	12794	\$10,392.42*
Reason: Proof of Claim asserts claim related to litigation case KEF-2004-0377. Judgment was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the order. All deposited funds have been withdrawn from the account.						
6	FINCA PERSEVERANCIA, INC. MARGARITA WILSON 9166 CALLE MARINA PONCE, PR 00717	06/08/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	35047	\$415,436.07*
Reason: Proof of Claim asserts claim related to litigation case KEF-2011-0244. Amended judgment was entered in the case, with respect to this creditor, and HTA deposited funds with the Commonwealth court in compliance with the judgment. The funds were withdrawn on 2/26/2014 and 4/19/2021.						
7	HERNANDEZ RENTAS, LUIS A. PO BOX 1958 LAS PIEDRAS, PR 00771	06/07/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	49585	\$64,477.87
Reason: Invoices totaling \$64,477.87 were paid via checks 00505040, 00507002, 00507003, and 00620262 on 09/15/2014, 09/19/2014, 09/19/2014, and 08/27/2015.						
8	LAS MONJAS REALTY II, SE G. CARLO-ALTIERI LAW OFFICES 254 CALLE SAN JOSE, THIRD FLOOR SAN JUAN, PR 00901	06/06/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	36496	\$1,274,000.00*
Reason: Proof of Claim asserts claim related to litigation cases KAC-2010-1332 and KEF-2016-0083. Judgment was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the order.						

## Four Hundred Eightieth Omnibus Objection

## Exhibit A - Satisfied Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
9	MANDRY MERCADO, SUCESION PASTOR MARIA E. VICENS 9140 MARINA ST. SUITE 801 PONCE, PR 00717	06/08/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	41356	\$810,266.48*
	Reason: Proof of Claim asserts claim related to litigation case KEF-2011-0244. Judgment was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the order.					
10	NUSTREAM COMMUNICATION INC. HECTOR FIGUEROA VINCENTY ESQ. CALLE SAN FRANCISCO 310 STE. 32 SAN JUAN, PR 00901	04/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	8778	\$9,000.00
	Reason: Invoices totaling \$9,000 were paid via electronic transfers CPI8001289 and CPI8001471 on 04/06/2018 and 05/08/2018.					
11	SAAVEDRA CASTRO, IVETTE PO BOX 9021782 SAN JUAN, PR 00902-1782	06/11/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	82943	\$300,000.00*
	Reason: Proof of Claim asserts claim related to litigation case KEF-2006-0464. Settlement was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the settlement.					
12	SAAVEDRA CASTRO, JOSE MARTIN JUAN H SAAVEDRA CASTRO PO BOX 9021782 SAN JUAN, PR 00902-1782	06/11/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	78911	\$300,000.00*
	Reason: Proof of Claim asserts claim related to litigation case KEF-2006-0464. Settlement was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the settlement.					
13	SAAVEDRA CASTRO, JUAN H. PO BOX 9021782 SAN JUAN, PR 00902-1782	06/11/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	87042	\$300,000.00*
	Reason: Proof of Claim asserts claim related to litigation case KEF-2006-0464. Settlement was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the settlement.					



## Four Hundred Eightieth Omnibus Objection

## Exhibit A - Satisfied Claims

					ASSERTED CLAIM AMOUNT
NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	
14 SAAVEDRA CASTRO, YVONNE JUAN H. SAAVEDRA CASTRO PO BOX 9021782 SAN JUAN, PR 00902-1782	06/11/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	61569	\$300,000.00*
Reason: Proof of Claim asserts claim related to litigation case KEF-2006-0464. Settlement was entered in the case and HTA deposited funds with the Commonwealth court in compliance with the settlement.					
15 ZLS DEVELOPMENT CORPORATION C/O MR JORGE C VENEGAS HUDDERS ABOGADO DEL ACREEDOR PO BOX 361172 SAN JUAN, PR 00936-1172	05/29/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	30837	\$820,000.00*
Reason: Proof of Claim asserts claim related to litigation case KEF-2011-0345. Settlement was entered in the case, with respect to this creditor, and HTA deposited funds with the Commonwealth court in compliance with the stipulation. The funds were withdrawn, in a total amount of \$298,449.66, on 1/24/2017 and 2/27/2020.					
TOTAL					\$4,805,046.84*